

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO  
LAS CRUCES DIVISION

**SANJUANA QUIROZ, Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFF**

vs.

No. 2:21-cv-1197-KRS-DLM

**DCT ENTERPRISES OF NEW MEXICO, LLC**

**DEFENDANT**

**DECLARATION OF SAMUEL BROWN REGARDING  
SUPPLEMENTAL ATTORNEYS' FEES**

I, Samuel Brown, do hereby swear, affirm, and attest as follows, based upon my personal knowledge of the matters contained herein:

1. My name is Samuel Brown, and I am over the age of eighteen (18) and duly qualified to execute this declaration.
2. I am a resident and domiciliary of the State of Arkansas.
3. I am an attorney licensed in the state and federal courts of Arkansas, as well as the Eastern District of Texas.
4. I have three (3) years of experience as an attorney, all of them as a settlement specialist in Fair Labor Standards Act wage-and-hour practice, including collective actions.
5. Consistent with the Declaration of Josh Sanford submitted with Plaintiff's Motions for Default Judgment, see ECF Nos. 9-3 & 20-3, my hourly rate billed on this matter is \$220.00 per hour.
6. I have billed 2.9 hours to this matter for purposes of preparing for and attending the hearing on Plaintiff's Second Motion for Default Judgment.

7. The following is a breakdown of this billed time by subject.
  - a. 0.2 hours: Composed electronic communications to Plaintiff regarding the date, time, and method of appearance for upcoming hearing as well as preparations for it.
  - b. 0.5 hours: Performed legal research regarding applicable standards for tip credits, mileage reimbursement, and default judgments.
  - c. 1.2 hours: Telephone conferences with Plaintiff regarding upcoming hearing and requested information from Court.
  - d. 1 hour: Attended default judgment hearing.
8. No additional costs have been billed to this matter in connection with the hearing.
9. In total, Plaintiff requests \$638.00 in additional attorneys' fees in connection with the hearing (\$220.00 x 2.9).

**PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY  
UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING  
IS TRUE AND CORRECT.**

Executed on this day October 17, 2023.

*/s/ Samuel Brown*  
**SAMUEL BROWN**